



United States Department of Agriculture

Agricultural Marketing Service, Specialty Crops Program, Specialty Crops Inspection Division

GOOD AGRICULTURAL PRACTICES (GAP) AUDIT PROGRAM SCOPE

Purpose

This document defines the scope of the U.S. Department of Agriculture (USDA) GAP audit program, including the types of audit services offered under the USDA GAP audit program, and the types of commodities and operations that may be covered under the program.

USDA GAP Audit Services

USDA GAP audit services include both process and system audits.

Our process audits are the USDA Good Agricultural Practices and Good Handling Practices (GAP&GHP), Produce GAPs Harmonized, Harmonized GAP Plus+, Tomato Food Safety Audit Protocol, Mushroom GAP, California Leafy Green Marketing Agreement (LGMA), Arizona LGMA, and California Cantaloupe Advisory Board audits. Information about each of these programs, including their respective standards, checklists, and other guidance, is posted at: www.ams.usda.gov/gapghp.

The USDA system audit is GroupGAP, which is a certification option for any group of production locations and secondary activity locations that agree to operate under a shared quality management system and seek certification under one of the USDA GAP audit services. Information about GroupGAP is posted at: <https://www.ams.usda.gov/services/auditing/groupgap>.

Commodities

Fresh specialty crops **may be** audited using USDA GAP&GHP, Produce GAPs Harmonized, and the Harmonized GAP Plus+ audits.

Section 101 of the Specialty Crops Competitiveness Act of 2004 (7 U.S.C. 1621 note), as amended under [section 10010 of the Agricultural Act of 2014, Public Law 113-79](#) (the Farm Bill), defines specialty crops as “fruits and vegetables, tree nuts, dried fruits, horticulture, and nursery crops (including floriculture).” To be considered a specialty crop, eligible plants must be cultivated or managed, and used by people for food, medicinal purposes, and/or aesthetic gratification. USDA’s detailed [definition of specialty crops \(pdf\)](#) is posted at: <https://www.ams.usda.gov/services/grants/scbgp/specialty-crop>.

Effective Date: April 2020

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The following are lists of crops that may be or are not covered by USDA GAP audit services. These lists are not exhaustive lists – they are representative of products that have previously been requested for audits. To request an audit for crops not covered by the specialty crops definition or in the lists below, please contact the USDA Specialty Crops Inspection Division (SCI) Audit Services Branch at 202-720-5021 or SCAudits@usda.gov.

Crops/processes, in addition to those included in under the specialty crop definition, that **may be** covered by USDA GAP audit services include:

- Culinary herbs
- Dried beans
- Edamame
- Edible flowers
- Fresh tea leaves
- Harvested maple sap
- Hops
- Microgreens
- Pea tendrils
- Plants
- Tendrils
- Shoots
- Wheat grass

Crops that **are not** covered by USDA GAP audit services include:

- Algae
- Forage and grain products
- Mint oil and other similarly produced oils
- Medicinal herbs
- Sea asparagus
- Seaweed
- Sprouts

Fresh Cut Produce

A USDA GAP&GHP part 6 audit **may be** used for the storage, transport, and distribution of fresh-cut produce that is already packed. Fresh specialty crops that are processed into fresh-cut product fall under Food and Drug Administration (FDA) regulations for Good Manufacturing Processes (GMPs). The USDA Plant Systems Audits (PSA) would be the appropriate audit protocol to use for the processing of fresh cut produce. For more information about the PSA audit service, please contact the SCI Audit Services Branch at 202-720-5021 or SCAudits@usda.gov.

Mushrooms

The Mushroom GAP, USDA GAP&GHP, and Harmonized audits can be used to audit all species of mushrooms grown in enclosed facilities. Wild mushrooms **are not** covered by USDA GAP audit services.

Sprouted Seeds: Sprouts, Shoots, and Microgreens

Sprouted seeds are foods obtained from the germination of seeds, and include sprouts, shoots, and microgreens.

- Sprouts are sprouted seeds obtained from the germination of seeds. They have cotyledons (or seed leaves) that are un- or under-developed. True leaves have not begun to emerge. The final product is intended to be eaten whole, including the seed. Sprouts **are not** covered by USDA GAP audit services.

- Shoots and microgreens are sprouted seeds obtained from germination with true leaves that have emerged. The shoots and leaves are “harvested” for use. “Harvested” shoots and microgreens do not include the seed teguments or the roots. Shoots and microgreens may be sold as an entire plant, but the entire plant is not intended for consumption as roots are not consumed. Shoots and microgreens **may be** covered by USDA GAP audit services.

Types of Operations

Fresh specialty crop production operations may grow, harvest, pack, store/hold, transport, and distribute product prior to any processing. Conventional, organic, greenhouse, aeroponic, and hydroponic production **may be** covered by USDA GAP audit services.

U-pick Operations **may be** covered by USDA GAP audit services.

The following guidance outlines the various USDA audits and the types of the operations for which they are applicable:

Type of Audit	Available for:	NOT Available for:
USDA Produce GAPs Harmonized Food Safety Standard - Post Harvest Audit USDA Harmonized GAPs Plus+ - Post Harvest Audit	<ul style="list-style-type: none"> ✓ On-farm packinghouses for fresh fruits, vegetables, and other specialty crops ✓ Packinghouses for fresh fruits, vegetables, and other specialty crops ✓ Wholesale distribution centers and terminal warehouses distributing Raw Agricultural Commodities (RACs), including operations that distribute fresh-cut produce ^{1, 2} ✓ Repack operations¹ 	<ul style="list-style-type: none"> × Fresh-cut processing operations² × Fresh-cut repack operations²
Type of Audit	Available for:	NOT Available for:
USDA GAP&GHP Audit -Part 6	<ul style="list-style-type: none"> ✓ Wholesale distribution centers and terminal warehouses distributing RACs, including operations that distribute fresh-cut produce² ✓ Repack operations 	<ul style="list-style-type: none"> × Packinghouses, × Fresh-cut processing operations² × Fresh-cut repack operations²

¹ These operations are not covered by the scope of recognition for GFSI technical equivalency.

² For fresh-cut produce, it is important that only operations that distribute fresh-cut produce are audited using USDA GAP audit services. When fresh specialty crops are processed into fresh-cut product, this process falls under the FDA regulation for GMPs. If an auditee would like to be audited for the processing of fresh-cut produce, the USDA Plant Systems Audits (PSA) would be the appropriate audit protocol to use (for more information about the PSA audit service, please contact Audit Services Branch at 202-720-5021 or SCAudits@usda.gov).

USDA Harmonized GAP Plus+ Audit Service

The USDA Harmonized GAP Plus+ audit service aligns with the Technical Equivalency requirements of the Global Food Safety Initiative's (GFSI) Benchmarking Requirements Version 7.1 Part III- B1 Farming of Plants and D, Preprocessing of Plant Products. The scope of GFSI's recognition of the USDA Harmonized GAP Plus+ audit is restricted to the farming of fruits, vegetables, and other specialty crop in the United States of America and its territories and possessions, and excludes grains and pulses.

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